

COHEN & GREEN

July 27, 2022

Hon. Lewis A. Kaplan
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Kaplan:

My firm represents the Plaintiff in the case named above. I write regarding Defendants' motion to compel at Dkt. No. 30. Immediately after the motion was filed, I provided Defendants with a copy of the release they sought. I had been obtaining the release, but neglected to respond to Defendants' counsel's emails — though I had intended to. Immediately upon seeing the motion, I personally ensured we obtained and provided the appropriate form of the HIPAA release (Plaintiff had provided the 160.50 release some time ago).

I sincerely apologize for the oversight, but can confirm that Defendants now have the required release. Obviously, Defendants' counsel should not need to follow up multiple times for basic information. I can also confirm I have spoken with Defendants' counsel and we both agree the motion at Dkt. No. 30 is fully resolved.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

City of New York by official service email.